

## Early Head Start Expansion and Child Care Partnerships FAQs, Volume 3

*Published July 21, 2014*

### Questions about the Initiative

- 1. I know that a separate FOA is going to be posted specifically for AIAN and Migrant and Seasonal programs, but are AIAN and Migrant and Seasonal programs eligible to apply for the general Early Head Start and EHS-Child Care Partnership Grants?**

Yes, AIAN and Migrant and Seasonal Head Start grantees are eligible to apply under the Early Head Start Expansion and EHS-CC Partnership Grants HHS-2015-ACF-OHS-HP-0814.

### Questions about the Grant Application Process

- 2. Should the Early Head Start - Child Care Partnerships funding only be used to serve children with subsidies for the portion of the day that they don't have a subsidy? Or can both EHS-CC funding and subsidy funding be used to serve a child during the same time period, with the EHS-CC funding being used to fund services that aren't funded by the subsidy?**

EHS-CC Partnership funds cannot replace existing CCDF or other funds used to operate the child care partner: existing child care funds must continue to cover ongoing child care costs. EHS-CC Partnership funds should layer on existing child care funds for targeted program improvements and to meet specific EHS requirements. Grantees will be required to have budgets that reflect the multiple funding sources, and cost allocation plans to ensure that each funding source is used for allowable purposes without duplicate payment. Each funding source will be used for different parts of the program to ensure no duplicative payment. For example, an EHS-CC partnership might use one source for basic programming costs and another source for quality enhancements (e.g., training, equipment, supplies). Alternatively, a partnership might use one source for certain periods of time (e.g., core hours) and another source for other periods (e.g., before and after care). By combining funding sources, the EHS-CC partnerships will be able to increase the number of children receiving high quality services.

The following is a useful resource for information on maximizing resources when there is more than one source of funding: <https://childcareta.acf.hhs.gov/early-head-start-child-care-partnerships>

- 3. What if a child care center is currently operating and partially financed via a faith based organization? Would this status prohibit them from applying for this opportunity if they agree to change their curriculum to conform to EHS guidelines and regulations? Would the program have to move out of the church premises? The program has 501 (c) 3 status. Could they apply as a non-profit or they would have to apply as a faith-based organization?**

Under Section III.1. Eligible Applicants of the FOA, eligible applicants are any public entities, including states, or non-profit or for-profit private entities, including community-based and faith-based organizations, pursuant to section 645A(d) of the Head Start 42 U.S.C. § 9840a(d).

The following link is a useful resource for information regarding ACF's policy on grants to faith-based organizations: <http://www.acf.hhs.gov/acf-policy-on-grants-to-faith-based-organizations>

- 4. In my state, child care ministries go through voluntary certification, they are not technically "licensed." Would ministries that have gone through such certification be eligible program sites?**

Regardless of state exemptions and the terminology used within a state (i.e., licensed or certification), all partner sites must be regulated. The term “regulated” means a provider who meets state-established health and safety standards and is subject to monitoring. If a program meets those two criteria, they are considered “regulated” for purposes of EHS-CC partnerships. Self-certification by the provider without documentation or verification is not sufficient.

**5. I need clarification on how to submit a certain part of my application and/or the formatting required of the application. Who can I contact for assistance?**

The Funding Opportunity Announcement (FOA) provides guidance and instructions on how to apply. Section IV.2 of the FOA addresses Content and Form of Application Submission. [Grants.gov](http://Grants.gov) also provides guidance on how to register your organization to apply for the Early Head Start Expansion and EHS-CC Partnership grant opportunity. Please visit [Grants.gov](http://Grants.gov) to view instructions and resources for applicants. ACF does not provide direct guidance or instruction in the development of an applicant’s project design or in writing their applications.

**6. I am an existing EHS grantee that partners with a local child care program that does not currently serve infants and toddlers. My program would like to apply for EHS-CC Partnership funding in order to expand the services offered at our partner agency to include infants and toddlers. However, would the older children need to be included in the EHS-CC Partnership?**

No. EHS-CC Partnership slots will serve children in center-based settings from birth to 36 months. Additionally, EHS-CC Partnership slots will serve children in family child care settings from birth to 48 months. Early Head Start Expansion slots, consistent with regulations, may serve pregnant women and children from birth to 36 months in center-based settings.

**7. Can an existing EHS grantee that is seeking to expand its existing EHS programs use existing EHS funds to cover proposal costs to write the application for the EHS - Child Care Partnership Grant? (The existing programs would benefit from the EHS Child Care Partnership Grant.)**

No. Applicants cannot use funds from an existing EHS grant to apply for funding under this FOA. Section II of the FOA also states, “Note: Costs incurred for grant application preparation are not considered an approved use of start-up costs and may not be included in the project budget or budget justification.”

**8. If we are a fiscal lead proposing to partner with one of our existing sites under EHS-CCP, do we need to produce a MOU/Third-Party Agreement with what would essentially be ourselves?**

Applicant entities have the discretion to decide what type of formal agreement they intend to form with partner agencies. That agreement must be binding and fully describe the roles and responsibilities of all partner agencies.

ACF does not provide direct guidance or instruction in the development of an applicant’s project design or in writing their applications. Applicants should use their best judgment in determining whether they are able to meet the requirements contained in the funding opportunity announcement (FOA), whether they are able to develop an application they believe to be responsive to the FOA and in designing and writing their applications. Applications will be reviewed and evaluated by objective review panels using the criteria described in Section V.1 of the FOA. The review panels will use the FOA as their principal guidance available to them in the same way that it is the principal guidance for applicants.

- 9. With regards to 1.7 and the review criteria, can you provide a better estimate for the number of days that defines "soon after award"? This will allow us to give a more precise projected start date and timeline.**

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- 10. What is the anticipated number of days between an "award notice" and the actual receipt of funds? Do you anticipate the awards to be distributed before the end of 2014?**

When the grantee receives a "Notice of Award" the funding is available. ACF anticipates that all awards will be issued by March 2015.

- 11. Is there a maximum allowable amount of the total request, either in terms of percentage or nominal dollars that can consist of start-up and construction? To continue along this line of questions, if our application is to be competitive, is there a recommended amount of the total request (in % or \$) that can consist of start-up and construction?**

Section II of the FOA, Award Information, includes guidance on start-up costs. ACF does not have a recommended percentage of allowable costs.

- 12. In addition to writing for expansion of new EHS slots - is the EHS/CCP funding an opportunity - along with child care subsidy revenue, for us to expand our existing center-based EHS to five days a week and 10 hours each day?**

No. Applicants cannot apply for funding under this FOA to extend the days or hours of their existing EHS program.

- 13. Do I need to mail the 424's with original signatures?**

Please visit [Grants.gov](http://Grants.gov) for guidance on standard forms, assurances, and certifications including the 424.

- 14. The EHS group size of eight and ratios of one teacher for every four children will require child care center partners in most states to reduce the group size, probably for infants but certainly for toddlers and 2-year-olds. In a child care center budget, each classroom has to support its occupancy and share of administration as well as any other direct costs. If a center reduces the size of a group there is a cost in lost revenue from the tuition and/or subsidy the 'removed' children would have generated. My question is: is lost revenue an allowable cost in an EHS-CC Partnership budget?**

No. Lost revenue is not an allowable cost: applicants should propose a budget built on actual costs and expected revenue in order to meet the EHS standards. Costs can be re-allocated across the program as long as they are allowable and reasonable.

- 15. In my state, many child care centers have an enrollment that is 100 percent eligible for child care subsidies, but may only have a handful of parents with an active subsidy at any given time because the number of available subsidies is so small. Even in a center where 100 percent of children qualify for a subsidy, do we have to maintain that 25 percent of our enrolled children actually receive a subsidy?**

The 25 percent subsidy requirement is based on the number of EHS eligible children enrolled in the partner site, not the total number of children enrolled in the partner site. For example, if your center has 100 children and all 100 children **are** EHS eligible, then at any given time 25 percent of 100 (25 children) of EHS eligible children must have a subsidy. If the partner site has 80 children enrolled and only 40 are EHS eligible then at any given time 25 percent of 40 (10 children) must have a subsidy. Grantees must ensure that children whose families experience job loss or loss of child care subsidies will continue to be served.

The following is a useful resource for information on maximizing resources when there is more than one source of funding: <https://childcareta.acf.hhs.gov/early-head-start-child-care-partnerships>

#### Questions about Program Implementation

- 16. I have a group of ten infants and toddlers in my child care center, and I spread my operating costs across ten slots. In order to meet EHS standards I have to reduce the group size to eight children, can I re-allocate costs across the eight slots?**

Yes, costs can be re-allocated across the eight slots. Costs must also be allowable and reasonable.

- 17. Is it acceptable for the grantee to pay its partners a daily, weekly, or monthly rate for providing EHS services for the number of EHS eligible children enrolled in the EHS-CC partner sites?**

Yes. Each applicant entity can decide what system works most effectively with their partner agencies as long as the costs are allowable, reasonable, and allocable. The services delivered must be in alignment with the binding contract or agreement between the grantee and each partner.

- 18. Is the grant recipient required only to reimburse the child care program for certain costs where the program requests payment for those costs and then is reimbursed after the fact?**

The grantee can decide what system works most effectively with their EHS-CC partner agencies as long as the costs are allowable, reasonable, and allocable. Partners can be paid prospectively or on a reimbursable basis, as long as a system is in place to ensure that the costs are allowable, reasonable, and allocable. The services and costs paid by the grantee to its partners must be in alignment with the binding contract or agreement between the grantee and each partner.

- 19. When a parent loses their voucher, who pays for the child's enrollment? If the parent does not return to work, is the expectation that the child remains in center-based child care until age 3 or if possible, should the child be enrolled in a home-based program?**

Project budgets for the EHS-CC Partnership applications must also reflect child care subsidies for no less than 25 percent of the proposed slots at any given time. We fully understand that individual children may come on and off of the subsidy program. Grantees must ensure that children whose families experience job loss or loss of child care subsidies will continue to be served. Each applicant entity must plan their budget to accommodate possible changes in a child's funding source. Applicants are encouraged to work with the subsidy administration agencies to ensure that children can retain a subsidy when they remain eligible. Studies have shown that many families lose subsidy due to a failure to complete the recertification process. ACF is working with subsidy agencies to make the process work better for families; EHS-CC Partnership programs can be important in helping families' navigate the subsidy system. Grantees are also expected to propose program delivery options that support continuity of care and seamless transitions for children and families. EHS-CC Partnerships can be delivered through child care centers or family child care homes. Home-based options (home visiting) are not allowed.

- 20. If a classroom is large enough to support 12 children could the room be divided into two classes? One class would have eight children and two teachers and the other class would have four children and one teacher.**

Early Head start regulations require one teacher for a maximum of four infants and toddlers and group (classroom) sizes of no more than eight children. Classrooms must also have a minimum of 35 square feet per child. If a room is large enough and can be divided and furnished so that children's needs, including diapering, toileting, hand washing, feeding, etc. can be met, it is allowable to have two groups of children.

- 21. How would you classify a child in kinship care? The situation is that they are under the legal guardianship of a grandparent, aunt, uncle etc. due to many different situations. They are not classified as "foster" children, and often the reason for this is that it is "traditional" within our culture (caring for your family); and sometimes they do not want these children in "the system." For a child in kinship care, whose income (the child's parents or the child's legal guardians) should be used to determine income eligibility for Head Start or EHS-CC partnerships?**

The income of the legal guardian of the child at the time the child is being considered for enrollment should be used to determine eligibility.